

INITIAL CONFERENCE QUESTIONNAIRE

1. Deadline for all Rule 26(a)(1) disclosures (if later than the date of the initial conference, please explain why on a separate page): 4/2/2020
2. Deadline for first request for production of documents and first request for interrogatories: 4/16/2020
- 2(a). Additional interrogatories needed, if any, beyond the 25 permitted under the federal rules for: plaintiff(s) ____ ; defendant(s) ____
3. Date for completion of any joinder of additional parties and amendment of the pleadings: 6/1/2020
- 3(a). Number of proposed additional parties to be joined, if any, by: plaintiff(s) 0-3 ; defendant(s) ____
4. Number of depositions by plaintiff(s) of: parties 10 ; non-parties 10
5. Number of depositions by defendant(s) of: parties 1 ; non-parties 9
6. Date of status conference (joint status report due two business days in advance): _____
7. Date for completion of factual discovery: 11/2/2020
8. Are expert witnesses needed? Yes X No ____
- 8(a). Number of expert witnesses, if any, of plaintiff(s): medical 1 ; non-medical 3
- 8(b). Date for completion of those expert reports: 1/4/2021
- 8(c). Number of expert witnesses, if any, of defendant(s): medical 1 ; non-medical 3
- 8(d). Date for completion of those expert reports: 3/4/2021
9. Date for completion of expert discovery: 4/5/2021
10. Date of pretrial conference (brief *ex parte* statements of settlement position due via email two business days in advance): _____
11. Types of contemplated dispositive motions by plaintiff(s) and dates for filing of those motions: Partial MSJ
5/5/2021

12. Types of contemplated dispositive motions by defendant(s) and dates for filing of those motions: MSJ
5/5/2021
13. Have counsel reached any agreements regarding electronic discovery? (If so, please describe at the initial conference.) Yes ☐ No ☒
14. Have counsel reached any agreements for disclosure of experts' work papers (including drafts) and communications with experts? (If so, please describe on a separate page.) Yes ☐ No ☒
15. Will the parties unanimously consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)? (If any party declines to consent, answer no but do not indicate which party declined.) Yes ☐ No ☒

[Pursuant to § II(D) of the Court's order dated February 9, 2020 (DE #46), plaintiff respectfully encloses the transcript of the March 10, 2020 pre-motion conference for the Court's reference as pertinent to the initial conference.]

Defendants conferred with Plaintiff on this questionnaire on 3/31/2020 before Plaintiff supplied them with an amended complaint. They reserve the right to amend their answers to the questionnaire after seeing the amended complaint.